

**Issues Discussed During Development of Student Right-to-Know
Regulations and IPEDS Graduation Rate Survey**

Topic	Issues	Resolution/Conclusion
Tracking methodology	Track individual students or entire cohort as group? Track term-to-term?	Institutional burden minimized with "snapshot" methodology: analyze cohort at entry and again after 150% of normal time for longest program.
Fall term vs. full-year cohort	Institutions with fall-term cohorts do not include students who enter at other times.	Institutions already using these for other purposes. Less burden to continue.
Transfers-in	No consensus on how to determine 150% of normal time. Could require evaluating status of each student at time of entry. Necessary information for such evaluation not always available at entry.	Not require transfers-in to be included in graduation rate cohorts.
Definition of substantial preparation	No consensus on using academic standing at time of transfer, number of credits achieved, or transfer to a higher level program as evidence of substantial preparation.	Unresolved. Subsequent enrollment in another (title IV, HEA) eligible institution deemed to be sufficient to count as transfer.
Definition of completion	Transfer students may not receive degree from first institution.	SRK regulations allow institutions to count as completers students who complete transfer-preparatory programs without earning a degree.
Verification of transfers-out	Cost and burden	Not required since 1999.
Requirement to disclose/report transfers-out	Cost and burden	Deemed to be relevant to institutions whose graduation rates might be reduced due to substantial number of transfers. Required only for institutions whose mission includes providing substantial preparation for students to enroll in other institutions. Institutions required to report transfers-out they know about, but not required to create new systems to find them.
Disclosure of combined graduation/ completion and transfer-out rates vs. separate rates	Considered to not be useful as consumer information – could be confusing and misleading. Could also encourage manipulation of the data.	Separate rates required.

Student Privacy	Small cells may make it possible to identify individual students.	Institutions not required to disclose data for cells with 5 or fewer students.
Accuracy of GRS data	Auditable and detailed data to ensure accuracy and deter manipulation and abuse.	Use IPEDS enrollment data to define cohorts. No changes to cohort between the two "snapshots." GRS expanded beyond SRK requirements to include time to degree information and level of degrees earned . ¹
GRS: Consistency with methodologies used by other organizations	Not all compliant with SRK	4-year institutions provide data for subcohorts of bachelor-degree seeking students and others for consistency with NCAA data.
Part-time Students	No consensus on how to determine 150% of normal time. Could require tracking individual students.	Part-time cohorts Implemented for 2-year public college GRS in 1997, dropped in 2000.

¹ Original GRS forms included the number still enrolled, the number who left in good academic standing, details on transfers-out (level of institution), details on exclusions. These were removed in 2000.

Chronology

Development of Student Right-to-Know Regulations and IPEDS Graduation Rate Survey

November 1990 – Student Right-to-Know and Campus Security Act enacted (P.L. 101-542)

April 1991 – Higher Education Technical Amendments (P.L. 102-26)

(Limited graduation rate calculations to undergraduate students, waiver for data provided by athletic associations)

March 1991 – Dear Colleague Letter (DCL)

(General information about the Student Right-to-Know and Campus Security Act)

August 1991 – Dear Colleague Letter

(Detailed information about requirements in the Student Right-to-Know and Campus Security Act)

July 1992 – Notice of Proposed Rulemaking (Student Right-to-Know and Campus Security)

(Withdrawn following large number of comments)

December 1993 – Higher Education Technical Amendments (P.L. 103-208)

(Requirements for disclosures and reports to the Department of Education delayed until 270 days after final regulations issued)

January 1993 – IPEDS Graduation Rate Survey (GRS) Working Group Began Discussions

September 1995 – Notice of Proposed Rulemaking (Student Right-to-Know)

December 1995 – Final Regulations Implementing Student Right-to-Know Act

June 1997 – Education Technical Amendments (Title VI of P.L. 105-18)

(Changed cohort year from June 30 - July 1 to September 1 - August 31)

1997 – Implementation of GRS (4 versions)

October 1998 – Higher Education Amendments of 1998 (P.L. 105-244)

(SRK Disclosure date established as July 1)

November 1999 – Final Regulations Implementing Higher Education Amendments of 1998

August 2008 – Higher Education Opportunity Act of 2008 (HEOA) (P.L. 110-315)

(Included dissemination by NCES of 100% and 200% graduation rates on College Navigator; IPEDS began collecting in 2008-09. Institutions required to disclose graduation rates disaggregated by gender, race/ethnicity and financial aid status (received Pell Grant, subsidized federal loan, or neither.)

October 2009 – Final Regulations Implementing the HEOA Amendments to the Higher Education Act

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